

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$935,390.00 IN UNITED
STATES CURRENCY,

ONE 2013 LAND ROVER RANGE ROVER,
VEHICLE IDENTIFICATION NUMBER (VIN)
SALSP2E40DA786404, WITH ALL
APPURTENANCES AND ATTACHMENTS
THEREON,

ONE 2013 HONDA CIVIC LX, VEHICLE
IDENTIFICATION NUMBER (VIN)
2HGFG3B57DH529075, WITH ALL
APPURTENANCES AND ATTACHMENTS
THEREON, and

ELEVEN ASSORTED JEWELRY ITEMS,

Defendants.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit properties to the United States of America, under 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841(a)(1).

The Defendants In Rem

2. The defendant property, approximately \$935,390.00 in United States currency, was seized on or about October 1, 2019, from Govanny Molina and Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin.

3. The defendant property, one 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404, with all appurtenances and attachments thereon, was seized on or about October 1, 2019, from Govanny Molina at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin.

4. The defendant property, one 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075, with all appurtenances and attachments thereon, was seized on or about October 1, 2019, from Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin.

5. The defendant property, eleven assorted jewelry items, more specifically identified in A through K below, was seized on or about October 1, 2019, from Govanny Molina and Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin.

- A. One 14K yellow gold curb link necklace with diamonds,
- B. One 14K yellow gold curb link necklace,
- C. One 10K yellow gold Cuban link bracelet with diamonds,
- D. One 10K yellow gold bracelet with diamonds,
- E. One pair of 14K white gold non-matching, princess-cut diamond stud pierced earrings,
- F. One 10K two-tone (white & yellow) gold bracelet,
- G. One pair of 14K yellow gold “crown of light” halo cluster diamond pierced earrings,
- H. One 10K yellow gold “superman” style ring with diamonds,

- I. One 10K white gold single black princess-cut diamond pierced earring,
- J. One 10K yellow gold multi-halo-design ring with diamonds, and
- K. One 10K yellow gold tooth grill.

6. The defendant properties are presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

7. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

8. This Court has *in rem* jurisdiction over the defendant properties under 28 U.S.C. § 1355(b).

9. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred, at least in part, in this district.

Basis for Forfeiture

10. The defendant property, approximately \$935,390.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

11. The defendant property, one 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it represents proceeds of trafficking in controlled substances, was purchased with proceeds traceable to an exchange of money for controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

12. The defendant property, one 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it represents proceeds of trafficking in controlled substances, was purchased with proceeds traceable to an exchange of money for controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

13. The defendant property, eleven (11) assorted jewelry items, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it represents proceeds of trafficking in controlled substances or was purchased with proceeds traceable to an exchange of money for controlled substances in violation of 21 U.S.C. § 841(a)(1).

Facts

14. Marijuana is a Schedule I controlled substance under 21 U.S.C. § 812.

October 1, 2019 execution of search warrant at residence of Govanny Molina and Amanda Ware

15. On October 1, 2019, officers executed a search warrant at the residence of Govanny Molina and Amanda Ware, 4XXX W. Norwich Court, Milwaukee, Wisconsin (the “Residence”).

16. Govanny Molina was present at the Residence during execution of the search warrant.

17. Amanda Ware arrived at the Residence approximately one hour after officers began execution of the search warrant.

18. On October 1, 2019, the following items, among others, were in the living room of the Residence:

A. In a hallway closet area were the following:

- i. A box – with a shipping label originating from Trucker, Colorado – containing several bags and jars containing a total of approximately 34 grams of different strains of marijuana; and
 - ii. Several packages of cannabis-infused gummies.
 - B. Under a computer desk were several bags containing a total of approximately 455 grams of different strains of marijuana.
 - C. On a table were several bags, jars, containers, and vacuum-sealed bags containing a total of approximately 473.5 grams of different strains of marijuana.
- 19. On October 1, 2019, the following items, among others, were in the northwest bedroom of the Residence:
 - A. On the floor were two 20-gallon storage totes.
 - i. The first tote contained approximately \$450,500 in United States currency. This currency amount is a portion of the defendant approximately \$935,390 in United States currency.
 - ii. The second tote contained approximately \$452,680 in United States currency. This currency amount is a portion of the defendant approximately \$935,390 in United States currency.
 - B. In an ottoman were the following:
 - i. A semi-automatic handgun with laser and flashlight attachments and a magazine loaded with 10 unfired cartridges; and
 - ii. Two boxes of ammunition containing a total of approximately 250 unfired cartridges.
 - C. On or inside a dresser were the following:
 - i. A money counting machine;
 - ii. Approximately \$30,278 in United States currency. This currency amount is a portion of the defendant approximately \$935,390 in United States currency; and
 - iii. A jewelry display box with numerous pieces of jewelry and two Paks Jewelers appraisal forms for two bracelets – one appraised at \$15,500 and the other at \$8,000. The defendant eleven assorted jewelry items were located inside or near this jewelry box.

20. On October 1, 2019, the following items, among others, were in the garage of the Residence:

- A. On a table were the following:
 - i. A Food Saver vacuum sealer; and
 - ii. Baggies, containers, and vacuum-sealed bags containing a total of approximately 5,329.50 grams of marijuana.
- B. On the floor were the following:
 - i. Vacuum-sealed bags, tote containers, garbage bags, baggies, and jars containing a total of approximately 2,340 grams of different strains of marijuana;
 - ii. A case containing vape pens; and
 - iii. Various plastic containers containing approximately 13,509 packages of THC vape cartridges and THC edibles.

21. On October 1, 2019, the following vehicles were parked in the driveway of the Residence:

- A. The defendant 2013 Honda Civic LX registered to Amanda Ware.
- B. A 2005 BMW 330CI registered to Govanny Molina. Inside the vehicle were the following:
 - i. A vape vile,
 - ii. Three cell phones, and
 - iii. Approximately \$1,332 in United States currency. This currency amount is a portion of the defendant approximately \$935,390 in United States currency.

22. On October 1, 2019, the defendant 2013 Land Rover Range Rover was parked on the street near the Residence.

- A. The 2013 Land Rover Range Rover was registered to Govanny Molina.

- B. Inside the 2013 Land Rover Range Rover was approximately \$600 in United States currency. This currency amount is a portion of the defendant approximately \$935,390 in United States currency.

23. On October 1, 2019, Govanny Molina and Amanda Ware were arrested.

Govanny Molina's State Drug Charges

24. On October 5, 2019, Govanny Molina was charged in Milwaukee County Circuit Court, Case No. 19CF4433, with (1) possession of marijuana with intent to deliver (> 10,000 grams), modifiers – use of a dangerous weapon, as a party to a crime; and (2) maintaining a drug trafficking place, modifier – use of a dangerous weapon.

Amanda Ware's State Drug Charges

25. On October 5, 2019, Amanda Ware was charged in Milwaukee County Circuit Court, Case No. 19CF4434, with (1) possession of marijuana with intent to deliver (> 10,000 grams), modifiers – use of a dangerous weapon, as a party to a crime; and (2) maintaining a drug trafficking place, modifier – use of a dangerous weapon.

Administrative Forfeiture Proceedings

26. The Drug Enforcement Administration (“DEA”) began administrative forfeiture proceedings against the approximately \$935,390.00 in United States currency on the ground that the seized currency was used or intended to be used in exchange for controlled substances or was proceeds of trafficking in controlled substances.

27. The DEA began administrative forfeiture proceedings against (1) the 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404, (2) the 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075, and (3) the eleven assorted jewelry items on the ground that these seized items were purchased with proceeds traceable to an exchange of money for controlled substances.

28. On or about December 16, 2019, Amanda Ware filed a claim with the DEA in the administrative forfeiture proceedings to the defendant 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075.

29. On or about December 18, 2019, Govanny Molina filed a claim with the DEA in the administrative forfeiture proceedings to the following defendant properties:

(1) approximately \$935,390.00 in United States currency; (2) 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404; and (3) eleven assorted jewelry items.

Warrant for Arrest In Rem

30. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claims for Relief

31. The plaintiff alleges and incorporates by reference the paragraphs above.

32. By the foregoing and other acts, the defendant property, approximately \$935,390.00 in United States currency, was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

33. The defendant approximately \$935,390.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

34. By the foregoing and other acts, the defendant property, one 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404, represents proceeds of trafficking in controlled substances, was purchased with proceeds traceable to an exchange of

money for controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

35. The defendant 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404 is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

36. By the foregoing and other acts, the defendant property, one 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075, represents proceeds of trafficking in controlled substances, was purchased with proceeds traceable to an exchange of money for controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

37. The defendant 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075 is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

38. By the foregoing and other acts, the defendant property, eleven (11) assorted jewelry items, represents proceeds of trafficking in controlled substances or was purchased with proceeds traceable to an exchange of money for controlled substances in violation of 21 U.S.C. § 841(a)(1).

39. The defendant eleven (11) assorted jewelry items are therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant properties be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief

as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 9th day of March, 2020.

Respectfully submitted,

MATTHEW D. KRUEGER
United States Attorney

By: s/SCOTT J. CAMPBELL
SCOTT J. CAMPBELL
Assistant United States Attorney
Scott J. Campbell Bar Number: 1017721
Attorney for Plaintiff
Office of the United States Attorney
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 530
Milwaukee, Wisconsin 53202
Telephone: (414) 297-1700
Fax: (414) 297-1738
E-Mail: scott.campbell@usdoj.gov

Verification

I, Robert Gregory, hereby verify and declare under penalty of perjury that I am a Police Officer with the Milwaukee Police Department Special Investigations Division, that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 14 through 23 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Police Officer with the Milwaukee Police Department Special Investigations Division.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 3-9-20

s/ROBERT GREGORY
Robert Gregory
Police Officer, Milwaukee Police Department
Special Investigations Division

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA

US Attorney's Office, #530 Federal Building

517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

DEFENDANTS

APPROXIMATELY \$935,390.00 IN UNITED STATES CURRENCY,
et al.

County of Residence of First Listed Defendant Milwaukee

(IN U.S. PLAINTIFF CASES ONLY)

NOTE:

IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

☒ 1 U.S. Government
Plaintiff

☐ 3 Federal Question
(U.S. Government Not a Party)

☐ 2 U.S. Government
Defendant

☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(Place an "X" in One Box for Plaintiff)
(For Diversity Cases Only) and One Box for Defendant

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN

(Place an "X" in One Box Only)

☒ 1 Original
Proceeding

☐ 2 Removed from
State Court

☐ 3 Remanded from
Appellate Court

☐ 4 Reinstated or
Reopened

☐ 5 Transferred from
another district
(specify)

☐ 6 Multidistrict
Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
21 USC § 881(a)(6)

Brief description of cause:

VII. REQUESTED IN
COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

VIII. RELATED CASE(S)
IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

03/09/2020

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT PAID BY DEBIT CARD: \$0.00

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

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Case No.

APPROXIMATELY \$935,390.00 IN UNITED
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APPURTENANCES AND ATTACHMENTS
THEREON, and

ELEVEN ASSORTED JEWELRY ITEMS,

Defendants.

WARRANT FOR ARREST IN REM

To: THE UNITED STATES MARSHAL
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 9th day of March, 2020, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant properties pursuant to Title 21, United States Code, Section 881(a)(6), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not

be decreed; and due proceedings being had, that the defendant properties be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the following defendant properties, which are presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court:

- A. Approximately \$935,390.00 in United States currency, which was seized on or about October 1, 2019, from Govanny Molina and Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin;
- B. One 2013 Land Rover Range Rover bearing vehicle identification number SALSP2E40DA786404, which was seized on or about October 1, 2019, from Govanny Molina at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin;
- C. One 2013 Honda Civic LX bearing vehicle identification number 2HGFG3B57DH529075, which was seized on or about October 1, 2019, from Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin; and
- D. Eleven assorted jewelry items, more specifically identified in 1 through 11 below, which were seized on or about October 1, 2019, from Govanny Molina and Amanda Ware at or near 4XXX W. Norwich Court, Milwaukee, Wisconsin.
 - 1. One 14K yellow gold curb link necklace with diamonds,
 - 2. One 14K yellow gold curb link necklace,
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 - 4. One 10K yellow gold bracelet with diamonds,
 - 5. One pair of 14K white gold non-matching, princess-cut diamond stud pierced earrings,
 - 6. One 10K two-tone (white & yellow) gold bracelet,
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8. One 10K yellow gold “superman” style ring with diamonds,
9. One 10K white gold single black princess-cut diamond pierced earring,
10. One 10K yellow gold multi-halo-design ring with diamonds, and
11. One 10K yellow gold tooth grill.

Dated this ____ day of _____, 2020, at Milwaukee, Wisconsin.

STEPHEN C. DRIES
Clerk of Court

By:

Deputy Clerk

Return

This warrant was received and executed with the arrest of the above-named defendants.

Date warrant received: _____

Date warrant executed: _____

Name and title of arresting officer: _____

Signature of arresting officer: _____

Date: _____